

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

16 FEB -6 PM 4:03

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN D. KING (1),

RANDY D. GOODMAN (2),

Defendants.

CASE NO.

1119CR-0123

JUDGE

J. DLOTT

INDICTMENT

18 U.S.C. § 371

26 U.S.C. § 5841

26 U.S.C. § 5845(a)(8)

26 U.S.C. § 5845(f)

26 U.S.C. § 5861(d)

26 U.S.C. § 5871

THE GRAND JURY CHARGES,

INTRODUCTION

At all times relevant to this Indictment,

1. The defendants, **RYAN D. KING ("KING")** and **RANDY D. GOODMAN ("GOODMAN")**, were members of the United Sheepdogs of Ohio, (hereinafter "Sheepdogs"), a militia group whose approximately twelve members live throughout the Southern District of Ohio.

The Sheepdogs' training sessions included practicing long and short range shooting, along with discussions regarding, among other things, survival skills, and firearms.

2. The defendants, **KING** and **GOODMAN**, established and belonged to a small, subset of the Sheepdogs which they referred to as the "Special Projects Team."

3. The defendants, **KING** and **GOODMAN**, advocated that the Special Projects Team construct, use and stockpile destructive devices, including among other items, "crater makers," - or CO₂ (carbon dioxide) cartridges containing an energetic powder and a fusing system.

COUNT 1

(Conspiracy to Possess a Destructive Device in Violation of the National Firearms Act)

4. The allegations contained in paragraphs 1 through 3 are incorporated herein by reference.

5. From a date uncertain but at least from in or about October 2018, and continuing up to and including the date of this Indictment, in the Southern District of Ohio, and elsewhere, the defendants, **RYAN D. KING** and **RANDY D. GOODMAN**, did knowingly and intentionally combine, conspire, confederate and agree with each other, to commit the following offense against the United States and in violation of the National Firearms Act, 26 United States Code, Section 5801 et seq., that is, to knowingly possess one or more firearms, as defined in Title 26, United States Code, Section 5845(a)(8) and (f), specifically, a destructive device, which was not registered to either defendant in the National Firearms Registration and Transfer Record in violation of Title 26, United States Code, Sections 5841, 5861(d), 5871.

OVERT ACTS

6. In furtherance of the conspiracy, and to effectuate the objects thereof, the following overt acts, among others, were committed in the Southern District of Ohio and elsewhere,

a. On October 12, 2018, **KING** and **GOODMAN** traveled from Ohio to Knob Creek Gun Range - Machine Gun Shoot in West Point, Kentucky where **KING** purchased a wire assembly and inert grenades. **KING** suggested methods “[i]f we want to get real lethal,” which **GOODMAN** commented would make them an elite group.

b. On December 8, 2018, **KING** and **GOODMAN** attended a Sheepdogs’ Christmas party at **KING’s** residence located on South Main Street, Franklin, Ohio where **KING** showed **GOODMAN** a collection of parts necessary to make a destructive device, including a steel pipe with end caps, e-matches (electronic matches), and wireless relays. **KING** and **GOODMAN** discussed in detail various different improvised explosive devices and the methods for constructing them. Among other things, while examining a steel pipe and other parts, **KING** commented, “This could go under a front seat of a car very easily, engine of a car, wired into the breaking.” **GOODMAN** responded, “I like that, that’s the method I like.”

- c. On December 8, 2018, while at his residence in Franklin, Ohio, **KING** retrieved and displayed a CO2 cartridge that was equipped with a fuse and green electrical tape and was filled with an unknown substance, and referred to it as a “crater maker.”
- d. On January 5, 2019, **KING** and **GOODMAN** met at **GOODMAN**’s residence located on Brown Road, Ripley, Ohio to conduct testing of the “crater makers.” While a Sheepdogs’ training was scheduled there later that day, **KING** and **GOODMAN** had arranged via private Telegram chat to meet hours earlier to work on explosive devices. While at the milk house located on the property, **KING** and **GOODMAN** discussed construction and ignition logistics in detail. **GOODMAN** referenced the Boston Marathon bombing as an example of a remote detonation system that worked.
- e. On January 5, 2019, while at the milk house located on the property on Brown Road, in Ripley, Ohio, **KING** retrieved a pipe from the box containing the fuses and showed it to **GOODMAN**. **KING** remarked, “That will fuck some shit up.” **GOODMAN** then threw the pipe that **KING** provided, while **KING** timed the throw to determine the proper length of fuse needed. **KING** again remarked, “That’s gonna fuck some shit up,” and then described how he envisioned throwing and detonating the devices against persons he is fighting. **KING** explained that “it’s going to be lethal and if we want, we can pack it with BBs too.” **KING** then commented that they (**KING** and **GOODMAN**) should use metal pipe instead of PVC plastic, because metal would be more lethal. **KING** responded, “I say if you’re throwing that shit out, it [sic] because you want to kill.”
- f. On January 5, 2019, while at the milk house located on the property on Brown Road, in Ripley, Ohio, **GOODMAN** and **KING** each removed a CO2 cartridge from the box that **KING** brought. **KING** confirmed that the CO2 cartridges were the same “crater makers” that **KING** had shown **GOODMAN** in December. **GOODMAN** agreed to light one of the “crater makers” and **KING** lengthened the fuse. Once outside, **GOODMAN** detonated the “crater maker” behind a large pile of dirt. **KING** surveyed the damage and commented, “You can take down a small tree with that.”
- g. On January 5, 2019, while at the milk house located on the property on Brown Road, in Ripley, Ohio, **GOODMAN** and **KING** obtained the second “crater maker” and **GOODMAN** detonated it outside causing an explosion. **GOODMAN** stated, “That’s a nice unit I can see me making a bunch of them,” to which **KING** replied that he (**KING**) would teach **GOODMAN** how to make them.
- h. On January 18, 2019, while at the milk house located on the property on Brown Road, in Ripley, Ohio, **KING** built an improvised initiation system, made up of a battery, remote control receiver and transmitter, broken pen shaft, wire, rocket engine ignitor, and bottle rocket. After completion, **GOODMAN** took the improvised initiation system outside and attempted to ignite it without success.

KING then built a second improvised initiation system with a few modifications. Before testing the second system, **GOODMAN** asked, "Do we know how they built the pressure cookers for the Boston bombers, anybody have a clue how that worked other than they remoteted them with cell phones? We are talking this same type of concept , I'm assuming with this type of set up a lot of freaking black powder, shrapnel, BB's and whatever they had in it. They called the cell phone number that triggered that off thru the battery which was in the crock pot and boom." **GOODMAN** retrieved the second improvised initiation system, drove it a distance away and advised of its placement. Once the system was in place, **KING** went outside and initiated the transmitter causing the system to function and fire the bottle rocket. While pointing at the improvised initiation system **KING** stated, "You could build these devices with a pipe bomb rigged to it or two, they could just be sitting somewhere ready to deploy." **KING** also stated, "I want to focus on making these anti-personnel, I think these will be a lot more useful to us."

- i. On January 18, 2019, while at the milk house located on the property of 8550 Brown Road, in Ripley, Ohio, **GOODMAN** and **KING** discussed making pipe bombs out of PVC. **KING** stated, "It's not going to be near as lethal, if at all." **KING** explained how there is a much bigger blast when using steel pipe with the same amount of powder. **KING** expounded that the type of pipe bombs they (**KING** and **GOODMAN**) were discussing would not be used to defend a driveway. **GOODMAN** replied, "I was thinking pressure cookers." **KING** then stated, "If you really want explosions you would bury these in the driveway, so they go up and out. We can build land mines, I've already built them before, you know that. So we can build those if we need to, but this you would couple with a 5 gallon container of gasoline or diesel fuel." While speaking **KING** pointed to the two pipe end caps on the table. **GOODMAN** later commented the crater makers were impressive and stated, "I'm going to make some of them crater makers, I like that."

All in violation of Title 18, United States Code, Section 371.

COUNT 2

(Possession of an Unregistered Destructive Device)

1. The allegations contained in paragraphs 1, 2, 3, and 6(d) through 6(g) are incorporated herein by reference.
2. On or about January 5, 2019, in the Southern District of Ohio, the defendants, **RYAND. KING** and **RANDY D. GOODMAN**, did knowingly possess a firearm, as defined by Title 26, United States Code, Section 5845(a)(8) and (f), specifically, a destructive device, which

was not registered to either of the defendants in the National Firearms Registration and Transfer Record, in violation of the National Firearms Act, 26 United States Code, Section 5801, et.seq.

In violation of Title 26, United States Code, Sections 5841, 5861(d), 5871.

A TRUE BILL

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GRAND JURY FOREPERSON

Benjamin C. Glassman
BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY

Sheila G. Lafferty
SHEILA G. LAFFERTY
ASSISTANT UNITED STATES ATTORNEY